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July 2, 2018

VIA ECF AND ELECTRONIC MAIL

The Honorable Richard J. Sullivan
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2104
New York, New York 10007

Re: *In re Xunlei Securities Litigation (Case No. 1:18-cv-00467-RJS)*

Dear Judge Sullivan:

We represent defendants Xunlei Limited (“Xunlei”) and Lei Chen (collectively, “Defendants”), and respectfully submit this letter under Section I.C of Your Honor’s Individual Rules and Practices to request a continuance of (i) Defendants’ deadline to respond to the June 4, 2018 Consolidated Amended Class Action Complaint (“CAC”); and (ii) the corresponding briefing deadlines for Defendants’ anticipated motion to dismiss.

On April 23, 2018, Your Honor entered an order setting July 16, 2018 as Defendants’ deadline to respond to the CAC. See Dkt. 21. The Court further ordered that in the event Defendants moved to dismiss, Plaintiffs’ opposition would be due August 27, 2018, and Defendants’ reply would be due September 24, 2018. See *id.*

Defendants have made substantial progress in evaluating the bases for and preparing a motion to dismiss, but need additional time beyond the July 16 deadline because of (i) the foreign law issues presented by the CAC’s allegations, (ii) the logistical and other challenges this case presents for clients based in China who have little experience with United States litigation; and (iii) the press of counsel’s work commitments on other matters. We therefore request an extension of the deadline to August 3, 2018. Plaintiffs do not oppose this request, nor do they oppose the following revised schedule, subject to the Court’s approval:

- Motion to dismiss: August 3, 2018;
- Opposition: September 28, 2018;
- Reply: October 31, 2018.



No other extensions have been requested to extend Defendants' deadline to respond to the CAC or to the parties' briefing schedule. The parties previously requested an extension of Defendants' deadline to respond to Plaintiffs' original complaint until after the Court's appointment of lead plaintiffs and lead counsel and filing of a consolidated amended complaint, which Your Honor granted on April 2, 2018. See Dkts. 15, 16. The requested extension does not affect any dates other than those indicated above.

We appreciate Your Honor's consideration of this request.

Respectfully,

/s/ Jonathan Rosenberg

Jonathan Rosenberg
of O'MELVENY & MYERS LLP

cc: Joshua B. Silverman, Esq.
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Patrick V. Dahlstrom, Esq.
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SO ORDERED this the ____ day of July, 2018

RICHARD J. SULLIVAN
UNITED STATES DISTRICT JUDGE